



Environmental Protection Agency

4500 S. Sixth Street Springfield, IL. 62706

Ph. (217) 786-6892

December 29, 1981

Refer to: *0950105001*
Knox Co./LPC -- General
Galesburg/Gates Rubber
ILD #005230370
compliance

Gates Rubber
P. O. Box 1196
Knoxville Road
Galesburg, Illinois 61401

ATTENTION: Mr. Robert Siebert

Dear Mr. Siebert:

An inspection of the above facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on September 21, 1981. A copy of the inspection report is enclosed. The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended. Based on the information obtained during the inspection, we have determined that the above facility is exempt from RCRA.

Therefore, since your facility is not regulated under RCRA, we recommend that you submit a letter to U.S.E.P.A., Region V, RCRA Activities, P. O. Box 7861, Chicago, Illinois, 60680, requesting that your EPA Form 8700-12 Notification of Hazardous Activity be withdrawn. Copies of this letter should also be sent to U.S.E.P.A., Enforcement Division, Attention: Water and Hazardous Materials Compliance Section, 230 South Dearborn Street, Chicago, Illinois, 60604, and to the Illinois Environmental Protection Agency, Division of Land/Noise Pollution Control, 4500 South Sixth Street Road, Springfield, Illinois, 62706.

EPA Region 5 Records Ctr.



325912

Gates Rubber
Page 2
December 29, 1981

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report or letter, please contact Glenn Savage at the above number.

Sincerely,



Monte M. Nienkerk
Central Region Manager
Land Field Operations Section
Division of Land/Noise Pollution Control

MMN/GDS/cp

Enclosure

cc: DLPC Division File
DLPC/FOS, Central Region
U.S.E.P.A./Region V

L P C F C O 5 5 C
(1) (8) (9)

I S S

ILD 005230370

OBSERVATION REPORT - SITE INVENTORY NO. GENERAL

(11) (18)

KNOX

CO. - L.P.C.

Region # CDate 09/21/81

(20) (25)

GALESBURG/ GATES RUBBERLetter Sent (Yes or No) Y

(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No (X)

Time: From 09:30 A mWeather Bo's clear

Ground Water() Surface() Other()

To 10:10 A m

Photos Taken: Yes () No (X)

Interviewed Robert SiebertInspector G D S

(27) (29)

Previous Inspection Previous Correspondence

Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage ()

E.P.A. Permit () NA

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other (X)

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6) 1

(30)

Board Order ()

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

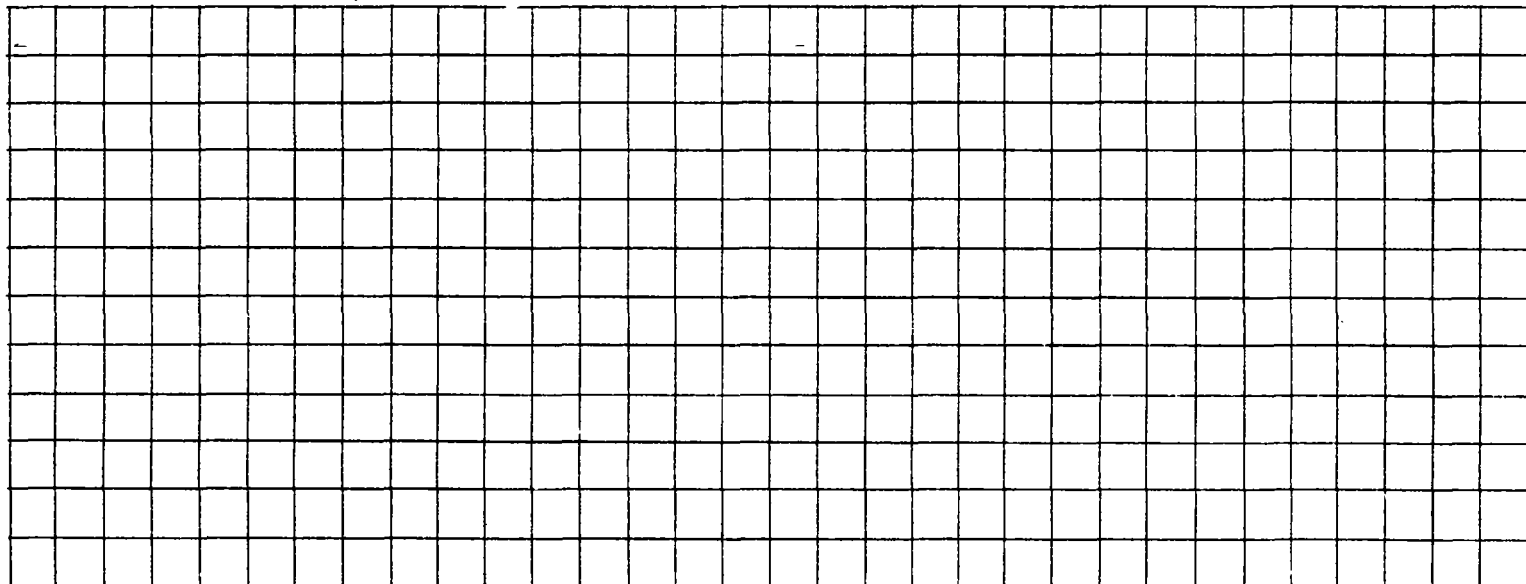
DETERIORATED

I (S) or D 5
(62)

GENERAL REMARKS: An Interim Status Standards Inspection was conducted on September 21, 1981 at the Gates Rubber Co plant in Galesburg. Robert Siebert, Quality Control Manager, was present during the interview, and represented the plant. Thiessam - P 117 - was listed as the hazardous waste generated at the facility. However, the U.S. E.P.A. has changed the listing of the waste to (1,1-dimethylthiocarbamoyl) disulfide and has changed the compounds listing to U 244. This waste does not meet the requirements of an acutely hazardous waste. This plant's concern

INTERVIEW: was the drums and their inner liners which contained the raw material, thiessam. This waste is also subject to the small quantity generator exclusion as defined in 261.5. Since, the plant is not generating 1000 kilograms a month of the waste, the site can be considered a small quantity generator. Also, according to 261.7 at least one inch of residue must be accumulated in the drums to be considered. This is not happening at the facility. (See information submitted to Agency by Robert Siebert.

DIAGRAM: Facility is exempt from RCRA.



(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

a. Notified the Administrator
in writing? _____

b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country? _____

c. Met the Manifest requirements? _____

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements? _____

VIII. Remarks

REMARKS: _____



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DEC 13 1981

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS

The Gates Rubber Company
Galesburg Division

P. O. Box 1196

Galesburg, Illinois 61401

(309) 343-7171

December 16, 1981

Illinois Environmental Protection Agency
Glenn D. Savage, Jr.
Environmental Protection Specialist
Land Field Operations Section - Central Region
Division of Land/Noise Pollution Control
4500 South Sixth Street Road
Springfield, IL 62706

Re: The Gates Rubber Company
EPA I.D. Number: ILD005230370
Our telephone conversation on Wednesday, 12/16/81

Dear Glenn:

Attached you will find copies of the letters you requested covering the chemicals used by The Gates Rubber Company which have been reclassified by the federal government.

The specific material involved at the Galesburg operation was EPA Material P117-Thiuram.

Regards,


Robert Seibert,
Quality Control Manager

RS:jas

DEC 4 1980

cc: Bob Benschling - Eng.
Paul Hinkson - Galesburg

November 25, 1980

To: Bob Siebert - Galesburg

From: E. W. Karger - PEPP



Subject: Hazardous Waste Modifications

I have received word from the RMA representative, in Washington, that EPA has officially announced on November 25, 1980 the following changes in hazardous waste designations:

1. N - nitrosodiphenylamine EPA Material P083 has been deleted from the hazardous waste category. (Gates Raw Material 32-8003). This material previously had to have its containers and inner liners disposed of as a separate material. All hazardous waste restrictions are, therefore, eliminated.
2. All thiuram materials (EPA material P117) except bis (dimethylthiocarbamoyl) disulfide have been changed from the acute hazardous list (261-33(e)) to the toxic list (261-33(f)). Gates raw materials 32-3211, 32-3212, 32-3271 and 32-3294 are, therefore, moved to the toxic list. This means the containers and inner liners do not have to be separated and disposed of as a hazardous waste.

EWK:dm

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DEC 18 1981

ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS

MAR 9 1981

cc: R. K. Benschling - Eng.
P. Hinkson - Galesburg

February 26, 1981

To: Bob Siebert - Galesburg

From: E. W. Karger - PEPP



Subject: Hazardous Waste

Federal EPA regulation 40 CFR 262.41 requires an annual report of hazardous waste off site shipment. The EPA on January 26, 1981 indicated that NO ANNUAL REPORT FOR CALENDAR YEAR 1980 will be required.

The Federal EPA also took action on November 25, 1980 to remove some materials from the hazardous waste designation (list 261.33(e) and 261.33(f)) and to revise the status of other materials. These revisions affected only Gates plants where rubber mixing takes place or urethane products are produced.

The EPA revisions did, however, affect some of the general directions which were issued in "PEPP Guidelines for Hazardous Waste". Revised "General Directions, EPA 261.33(e), and 261.33(f)" sections are, therefore, included with this interhouse and should be entered in your guidelines booklet.

EWK:dm

Encl: Siebert

File: Hazardous Waste

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DEC 19 1981

DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATE OF ILLINOIS

E. W. Karger
February 26, 1981

3. List 261.33(e) Acute Hazardous Waste

(EPA per Federal Register November 25, 1980 - pages 78541-78542).

A. NEW DEVELOPMENT

The following materials and their containers and/or inner liners formerly considered hazardous waste HAVE BEEN REMOVED from this acute hazardous list.

P083 N-Nitrosodiphenylamine
Gates Raw Material 32-8003 (Retarder 8003)

P117 Thiuram
Gates Raw Materials 32-3211, 32-3212, 32-3271, 32-3294

B. GATES INVOLVEMENT

No materials used at Gates are on the list amended November 25, 1981.

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DEC 18 1981

DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATE OF ILLINOIS

JAN 12 1981

cc: R. K. Benschling - Eng.
Paul Hinkson - Galesburg

January 7, 1981

To: Bob Siebert - Galesburg
From: E. W. Karger - PEPP *E. W. Karger*
Subject: Hazardous Waste Revisions

On November 25, 1980 the EPA made changes to the status of several materials on the list of hazardous materials. These included:

1. P083 N - Nitrosodiphenylamine (Gates Raw Material 32-8003)
This material was previously on the ACUTE HAZARDOUS WASTE list 261.33(e) and has been completely removed from all hazardous waste lists (Reference attached page 78533).
2. P117 Thiuram (Gates Raw Materials 32-3211, -3212, -3271, -3294).
Only the material bis (dimethylthiocarbamoyl) disulfite is considered as hazardous. That material has been judged less hazardous and is included on list 261.33(f). I.D. number has been changed to U244. (Reference attached page 78534).
3. U238 Urethane
Only the material "ethyl carbamate (urthan)" is considered hazardous. Polyurethanes are not considered hazardous. (Reference attached page 78534).

The revised paragraphs 261.33(e) and 261.33(f) are attached (pg. 78541-78544).

EWK:dm

Encl: Siebert
Karger

File: Hazardous Waste

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DEC 10 1981

STATE OF ILLINOIS

I. Finalization of Chemical Product Names in § 261.33 (a) and (f)

A. The changes made in response to comments on specific listings are described summarily below. More detailed explanations are contained in the revised Background Document.

EPA hazardous waste No.	Compound name	Action taken	Reason
P019 and U160	2-Butanone peroxide (Methyl ethyl ketone peroxide)	Deleted from § 261.33(e). Remains in § 261.33(f). Added (R) designation.	2-Butanone peroxide and methyl ethyl ketone peroxide, synonyms for the same compound, were mistakenly included in both the § 261.33 (e) and (f) lists. This compound does not meet the criteria for listing as an acutely hazardous waste. However, the compound's oral (rat) LD50 of 484 mg/kg qualifies it for continued inclusion in § 261.33(f). Moreover, the compound is reactive, since it is an oxidizer.
P025	1-(p-Chlorobenzoyl)-5-methoxy-2-methylindole-3-acetic acid.	Moved from § 261.33(e) to § 261.33(f).	After evaluating the data supplied by the commenter which indicated that the correct oral (rat) LD50 value for the subject compound (also known as indomethacin) is 1100 mg/kg, not the cited 12 mg/kg, the Agency concluded that waste does not pose an acute hazard. However, since the Agency's Carcinogen Assessment Group has concluded that substantial evidence of carcinogenicity exists for indomethacin, the waste will remain listed under § 261.33(f) as U245.
P032	Cyanogen bromide	Moved from § 261.33(e) to § 261.33(f).	The LC50 value cited in the May 19th Background Document was incorrect. According to new data, the compound does not meet the criteria for listing as an acutely toxic waste. However, cyanogen bromide's inhalation (rat) LC50 of 4.55 mg/l/hr—only slightly less toxic than the standard for an acutely hazardous waste—qualifies it for inclusion as a hazardous waste. It thus remains listed under § 261.33(f) as U246.
P035	2,4-Dichlorophenoxyacetic acid (2,4-D)	Moved from § 261.33(e) to § 261.33(f) and listing clarified.	Re-evaluation of this listing in light of data received during the comment period indicates that the compound does not meet the criteria for listing as an acute hazard. Since the toxicity of 2,4-D is well recognized (for example, it is a National Interim Primary Drinking Water Standard pollutant), the compound is listed as a hazardous waste under § 261.33(f) as U240.
P052	Ethylcyanide	Deleted	The active peroxide (C ₂ H ₅ (O ₂)OOCH ₂ COO methyl) is marketed commercially in a number of chemical forms. To clarify that the listing is meant to cover these various forms, the listing description has been clarified by explicitly including 2,4-D's salts and esters.
P053	Ethylenediamine	Deleted	Listing duplicated P101 listing.
P061	Hexachloropropene	Moved from § 261.33(e) to § 261.33(f).	LD50 value cited in the May 19th Background Document was incorrect. New data indicates that the compound is unlikely to pose a substantial hazard to human health or the environment even if the waste is mismanaged, so the waste therefore has been deleted from § 261.33.
P079	Nitrogen peroxide	Deleted	The LC50 value cited in the May 19th Background Document was incorrect. According to new data, the compound does not meet the criteria for listing as an acutely toxic waste. However, hexachloropropene's inhalation (rat) LC50 of 2.4 mg/l/hr—only slightly less toxic than the standard for an acutely hazardous waste—qualifies it for inclusion as a hazardous waste. It thus remains listed under § 261.33(f) as U243.
P083	N-Nitrosodiphenylamine	Deleted	Listing duplicated P078 listing.
P086	Oleyl alcohol condensed with 2 moles of ethylene oxide.	Deleted	The LD50 value cited in the May 19th Background Document was incorrect. No information is presently available which shows that the waste poses a significant threat to human health or the environment even if it was mismanaged and if therefore has been deleted from § 261.33.
P090	Pentachlorophenol	Moved from § 261.33(e) to § 261.33(f).	The LD50 value cited in the May 19th Background Document was incorrect. New data indicates that the compound is unlikely to pose a significant threat to human health or the environment even if the waste is mismanaged. This conclusion is supported by the decision of the Food & Drug Administration to permit the use of this compound as an indirect food additive.
P100	1,2-Propenediol	Deleted	After reviewing in more detail the available studies, the Agency has concluded that pentachlorophenol does not meet the criteria for an acutely hazardous waste (see Listing Background Document for Wood Preserving, response to comments, November 1980). However, its toxicity is well recognized and the waste will remain listed under § 261.33(f) as U242.
			The LD50 value cited in the May 19th Background Document was incorrect. New data indicates that the compound is unlikely to pose a significant hazard to either human health or the environment even if the waste is mismanaged. This decision is further supported by the Food & Drug Administration's approval of this compound as a direct food additive.

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STATE OF ILLINOIS

I. Finalization of Chemical Product Names in § 261.33 (a) and (f)—Continued

A. The changes made in response to comments on specific listings are described summarily below. More detailed explanations are contained in the revised Background Document.

EPA hazardous waste No.	Compound name	Action taken	Reason
P117	Thiram	Moved from § 261.33(a) to § 261.33(f) and listing changed to clarify the specific waste being regulated.	According to the NIOSH "Registry of Toxic Effects of Chemical Substances", thiram is a synonym for bis(dimethylthiocarbamoyl) disulfide. Comments were received which indicated that other compounds were also known as "thirams". We have accordingly changed the listing "thiram" to clarify that the intended compound is "bis(dimethylthiocarbamoyl) disulfide". Secondly, the LC50 data cited in the May 19th Background Document was incorrect. According to the new data, the waste does not meet the standard for an acutely hazardous waste. However, bis(dimethylthiocarbamoyl) disulfide's synergistic action with alcohol could pose a substantial hazard to human health if the waste was mismanaged and, as a result, contaminated drinking water. Thus the compound has been listed in § 261.33(f) as U244.
U040 and U085	Chlorodibromomethane and Dibromochloromethane	Deleted	After reevaluating the available environmental and toxicological information, the Agency has concluded that the information is not conclusive enough to justify retaining the listing. Pending receipt of additional data, the waste has been removed from inclusion under § 261.33.
U044	Chloroform	Deleted (f) designation	Mistakenly included. Chloroform does not have a flash point below 60°C.
U100	Dimethylvinylamine	Deleted	Acutely toxic and remains listed as P082.
U104	2,4-Dinitrophenol	do	Acutely toxic and remains listed as P048.
U154	Methanol	Changed to (f) designation	After considering the comments received, the Agency has concluded that it has insufficient information to justify listing methanol for toxicity. However, since it has a flash point of 11°C, it will remain listed under § 261.33(f) as an ignitable waste.
U181	Methyl isobutyl ketone	Changed to (f) designation	After considering the comments received, the Agency has concluded that it has insufficient information to justify listing methyl isobutyl ketone for toxicity. However, since it has a flash point of 22.9°C, it will remain listed under § 261.33(f).
U197	Quinones	Changed to p-benzoquinone	As the May 19th Background Document indicated, the Agency's available toxicological data referred to p-benzoquinone only. The original listing of "Quinones" thus was over-inclusive. We are accordingly revising the listing description. Appendix A to the May 19th listing Background Document summarizes adverse health and environmental effects associated with p-benzoquinone.
U202	Saccharin	Added to listing "... and salts."	The May 19th Background Document was intended to include both the parent and its salts, since normal commercial use includes (and is known to include) both forms. In light of this common usage, we do not believe that any notice and comment issues are present. The arguments that saccharin is not carcinogenic were not deemed persuasive enough by the Agency to warrant deletion from § 261.33 list. That saccharin poses a significant carcinogenic hazard is amply demonstrated by the warnings that are required by the Food & Drug Administration to appear on any food to which saccharin is added.
U229	Trichlorofluoromethane	Deleted	Listing duplicated U121 listing.
U232	Urethane	Listing description modified	The original listing of urethane has been changed to read "ethyl carbamate (urethane)" to indicate more clearly that the listing does not refer to either the polymers commonly known as "polyurethanes" or their precursors.
U239	Xylene	Changed to (f) designation	Xylene was mistakenly listed as toxic instead of as ignitable. While xylene does not appear to pose a sufficient toxicity hazard for listing as a toxic waste, as the May 19th Background Document indicated, xylene is an ignitable waste due to its flash point of 27°C.

B. In addition to the above changes made in response to comments, the following changes, described summarily below, have been made as a result of the Agency's review of the interim final regulations.

EPA hazardous waste No.	Compound name	Action taken	Reason
P006	Aluminum phosphide	Added (f) designation	In addition to its reactivity toward water (indicated in the May 19th Background Document), the waste is also acutely toxic because of its toxicity. The (f) designation had been omitted inadvertently.
PC30	Cyanide salt mixtures not otherwise specified	Modified listing description	Clarify the meaning of the term "cyanides" in light of a comment which indicated that the listing might be misunderstood.
	Femic cyanide	Deleted	Listing duplicated P030 listing.

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§ 261.33 Discarded commercial chemical products, off-specification species, containers, and spill residues thereof.

The following materials or items are hazardous wastes if and when they are discarded or intended to be discarded:

(a) Any commercial chemical product, or manufacturing chemical intermediate having the generic name listed in paragraphs (e) or (f) of this section.

(b) Any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraphs (e) or (f) of this section.

(c) Any container or inner liner removed from a container that has been used to hold any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph (e) of this section, unless:

(1) The container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate; or

(2) The container or inner liner has been cleansed by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal; or

(3) In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container, has been removed.

(d) Any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraphs (e) or (f) of this Section. [Comment: The phrase "commercial chemical product or manufacturing chemical intermediate" having the generic name listed in . . . refers to a chemical substance which is manufactured or formulated for commercial or manufacturing use which consists of the commercially pure grade of the chemical, any technical grades of the chemical that are produced or marketed, and all formulations in which the chemical is the sole active ingredient. It does not refer to a material, such as a manufacturing process waste, that contains any of the substances listed in paragraphs (e) or (f). Where a manufacturing process waste is deemed to be a hazardous waste because it contains a substance listed in paragraphs (e) or (f), such waste will be listed in either §§ 261.31 or 261.32 or will be identified as a hazardous waste by

the characteristics set forth in Subpart C of this Part.]

(e) The commercial chemical products or manufacturing chemical intermediates, referred to in paragraphs (a) through (d) of this section, are identified as acute hazardous wastes (H) and are subject to the small quantity exclusion defined in § 261.5(e). [Comment: For the convenience of the regulated community the primary hazardous properties of these materials have been indicated by the letters T (Toxicity), and R (Reactivity). Absence of a letter indicates that the compound only is listed for acute toxicity.] These wastes and their corresponding EPA Hazardous Waste Numbers are:

Hazardous waste No.	Substance
P023	Acetaldehyde, chloro-
P002	Acetamide, N-(aminothiozomethyl)-
P057	Acetamide, 2-fluoro-
PC58	Acetic acid, fluoro-, sodium salt
P066	Acetamidic acid, N-((methylcarbamoyloxy)thio-, methyl ester
P001	3-(alpha-acetamylbenzyl)-4-hydroxycoumarin and salts
P002	1-Acetyl-2-thiourea
P003	Acrolein
P070	Aldicarb
P004	Aldrin
P005	Allyl alcohol
P006	Aluminum phosphide
P007	5-(Aminomethyl)-3-isoxazolid
P008	4-Aminopyridine
P009	Ammonium picrate (R)
P119	Ammonium vanadate
P010	Arsenic acid
P012	Arsenic (III) oxide
P011	Arsenic (V) oxide
P011	Arsenic pentoxide
P012	Arsenic trioxide
P038	Arsine, diethyl-
P054	Aspidine
P013	Banum cyanide
P024	Benzenamine, 4-chloro-
P077	Benzenamine, 4-nitro-
P028	Benzene, (chloromethyl)-
P042	1,2-Benzenediol, 4-(1-hydroxy-2-(methylamino)ethyl)-
P014	Benzenethiol
P028	Benzyl chloride
P015	Beryllium dust
P015	Bis(chloromethyl) ether
P017	Bromoacetone
P018	Brucine
P021	Calcium cyanide
P123	Camphene, octachloro-
P103	Carbamimidoseacetic acid
P022	Carbon bisulfide
P022	Carbon disulfide
P095	Carbonyl chloride
P033	Chlorine cyanide
P023	Chloroacetaldehyde
P024	p-Chloroaniline
P026	1-(o-Chlorophenyl)thiourea
P027	3-Chloropropionitrile
P029	Copper cyanides
P030	Cyanides (soluble cyanide salts), not otherwise specified
P031	Cyanogen
P033	Cyanogen chloride
P036	Dichlorophenylarsine
P037	Dieldrin
P038	Diethylarsine
P039	O,O-Diethyl S-(2-(ethylthio)ethyl) phosphorothioate
P041	Diethyl-p-nitrophenyl phosphite
P040	O,O-Diethyl O-pyrazinyl phosphorothioate
P043	Diisopropyl fluorophosphate
P044	Dimethoate
P045	3,3-Dimethyl-1-(methylthio)-2-butanone, O-((methylamino)carbonyl) oxime
P071	O,O-Dimethyl O-p-nitrophenyl phosphorothioate

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Hazardous waste No.	Substance
P082	Dimethylnitrosamine
P046	alpha, alpha-Dimethylphenethylamine
P047	4,6-Dinitro-o-cresol and salts
P034	4,6-Dinitro-o-cyclohexylnitro
P048	2,4-Dinitrophenol
P020	Dinoseb
P085	Dithiophosphoramide, octamethyl-
P039	Disulfator
P049	2,4-Dinitroacet
P109	Dithiopyrophosphoric acid, tetraethyl ester
P050	Endosulfate
P088	Endothal
P051	Enorm
P042	Eprephena
P046	Ethanesulfonate, 1,1-dimethyl-2-phenyl-
P084	Ethenamine, N-methyl-N-nitroso-
P101	Ethyl cyanide
P054	Ethyleneimine
P097	Famohut
P056	Fluorine
P057	Fluoroacetamide
P058	Fluoroacetic acid, sodium salt
P065	Fulminic acid, mercury(II) salt (R,T)
P059	Heptachlor
P051	1,2,3,4,10,10-Hexachloro-6,7-epoxy-1,4,4a,5,6,7,8,8a-octahydro-endo,endo-1,4,5,8-dimethanonaphthalene
P037	1,2,3,4,10,10-Hexachloro-6,7-epoxy-1,4,4a,5,6,7,8,8a-octahydro-endo,exo-1,4,5,8-dimethanonaphthalene
P060	1,2,3,4,10,10-Hexachloro-1,4,4a,5,6,7,8,8a-hexahydro-1,4,5,8-endo,endo-dimethanonaphthalene
P004	1,2,3,4,10,10-Hexachloro-1,4,4a,5,6,7,8,8a-hexahydro-1,4,5,8-endo,exo-dimethanonaphthalene
P060	Hexachlorocyclohexane, exo,exo-dimethanonaphthalene
P062	Hexaethyl tetraphosphate
P116	Hydrazinecarbohydrazide
P068	Hydrazine, methyl-
P063	Hydrocyanic acid
P053	Hydrogen cyanide
P056	Hydrogen phosphide
P064	Isocyanic acid, methyl ester
P007	3(2H)-isoxazoline, 5-(aminomethyl)-
P092	Mercury, (aceto-O)phenyl-
P065	Mercury fulminate (R,T)
P016	Methane, carbonylchloro-
P112	Methane, tetranitro- (R)
P118	Methanethiol, trichloro-
P059	4,7-Methano-1H-indene, 1,4,5,6,7,8,8-heptachloro-3a,4,7,7a-tetrahydro-
P066	Methoxyl
P067	2-Methylaziridine
P068	Methyl hydrazine
P064	Methyl isocyanate
P069	2-Methylisocyanide
P071	Methyl parathion
P072	alpha-Naphthylthiourea
P073	Nickel carbonyl
P074	Nickel cyanide
P074	Nickel(III) cyanide
P073	Nickel tetracarbonyl
P075	Nicotine and salts
P076	Nitric oxide
P077	p-Nitroaniline
P078	Nitrogen dioxide
P076	Nitrogen(II) oxide
P078	Nitrogen(IV) oxide
P081	Nitroglycerine (R)
P082	N-Nitrosodimethylamine
P084	N-Nitrosomethylphenylamine
P050	5-Norbornene-2,3-dimethanol, 1,4,5,6,7,7-hexachloro, cyclic sulfite
P085	Octamethylpyrophosphoramide
P087	Osmium oxide
P067	Osmium tetroxide
P088	7-Oxabicyclo[2.2.1]heptane-2,3-dicarboxylic acid
P089	Parathion
P034	Phenol, 2-cyclohexyl-4,6-dinitro-
P048	Phenol, 2,4-dinitro-
P047	Phenol, 2,4-dinitro-6-methyl-
P020	Phenol, 2,4-dinitro-6-(1-methylpropyl)-
P009	Phenol, 2,4,6-trinitro, ammonium salt (R)
P036	Phenyl dichloroarsine
P092	Phenylmercuric acetate
P093	N-Phenylthiourea
P094	Phorate
P095	Phosgene
P096	Phosporine
P041	Phosphoric acid, diethyl p-nitrophenyl ester

Hazardous waste No.	Substance
P044	Phosphorodithioic acid, O,O-dimethyl S-[2-(methylamino)-2-oxoethyl]ester
P043	Phosphorofluoric acid, bis(1-methylethyl)-ester
P094	Phosphorothioic acid, O,O-dimethyl S-(ethylthio)methyl ester
P089	Phosphorothioic acid, O,O-diethyl O-(p-nitrophenyl) ester
P040	Phosphorothioic acid, O,O-diethyl O-pyrazinyl ester
P097	Phosphorothioic acid, O,O-dimethyl O-(p-((dimethylamino)sulfonyl)phenyl)ester
P110	Plumbane, tetraethyl-
P098	Potassium cyanide
P099	Potassium silver cyanide
P070	Propanal, 2-methyl-2-(methylthio)-, O-[(methylamino)carbonyl]oxime
P101	Propanenitrile
P027	Propanenitrile, 3-chloro-
P089	Propanenitrile, 2-hydroxy-2-methyl-
P081	1,2,3-Propanetriol, trimethyl- (R)
P017	2-Propanone, 1-bromo-
P102	Propargyl alcohol
P003	2-Propenal
P005	2-Propen-1-ol
P067	1,2-Propyleneimine
P102	2-Propyn-1-ol
P008	4-Pyridinamine
P075	Pyridine, (S)-3-(1-methyl-2-pyrrolidinyl)-, and salts
P111	Pyrophosphoric acid, tetraethyl ester
P103	Selenourea
P104	Silver cyanide
P105	Sodium azide
P106	Sodium cyanide
P107	Strontium sulfide
P108	Strychnidin-10-one, and salts
P108	Strychnidin-10-one, 2,3-dimethoxy-
P108	Strychnine and salts
P115	Sulfonic acid, thallium(I) salt
P109	Tetraethyldithiopyrophosphate
P110	Tetraethyl lead
P111	Tetraethylpyrophosphate
P112	Tetranitromethane (R)
P062	Tetraphosphoric acid, hexaethyl ester
P113	Thalic oxide
P113	Thallium(III) oxide
P114	Thallium(I) selenite
P115	Thallium(I) sulfate
P045	Thiofanox
P049	Thiomidocarbonic diamide
P014	Thiophenol
P116	Thiosemicarbazide
P026	Thiourea, (2-chlorophenyl)-
P072	Thiourea, 1-naphthalenyl-
P092	Thiourea, phenyl-
P123	Toxaphene
P118	Trichloromethanethiol
P119	Vanadic acid, ammonium salt
P120	Vanadium pentoxide
P120	Vanadium(V) oxide
P001	Warfarin
P121	Zinc cyanide
P122	Zinc phosphide (R,T)

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DEC 10 1981

STATE OF ILLINOIS

I. General Information:*

(J) Person(s) interviewed	Title	Telephone
<u>Robert Siebert</u>	<u>Quality Control Mgr.</u>	<u>309/343-7171</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
(K) Inspection Participants	Agency/Title	Telephone
<u>Glenn Savage</u>	<u>I.E.P.A./EPS</u>	<u>217/786-6892</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
(L) Preparer Information		

Name	Agency/Title	Telephone
<u>Glenn Savage</u> <i>Glenn Savage</i>	<u>I.E.P.A./EPS</u>	<u>217/786-6892</u>

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II. BRIEFLY DESCRIBE SITE ACTIVITY

An Interim Status Standards Inspection was conducted on September 21, 1981, at the Gates Rubber Co. in Galesburg, IL. The site is generating a hazardous waste, thiuram, which has been reclassified from an acutely toxic waste to a hazardous waste. Also, 1,000 kilograms of the waste are not being generated per month. The facility is only concerned with a small amount of residue, which might be left on the container in which the raw material was kept. This facility is exempt from RCRA at this time.

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	___	___	___	_____
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	___	___	___	_____
2. Name, mailing address, telephone number, and EPA ID number of generator?	___	___	___	_____
3. Name and EPA ID Number of transporter(s)?	___	___	___	_____
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	___	___	___	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	___	___	___	_____
7. Required certification?	___	___	___	_____
8. Required signatures?	___	___	___	_____
(C) Does the owner or operator submit exception reports when needed?	___	___	___	_____

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accord- ance with DOT regulations? (Required prior to movement of hazardous waste off-site)	___	___	___	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	___	___	___	_____
(C) If required, are placards available to transporter?	___	___	___	_____
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?	---	---	---	
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	---	---	---	
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	---	---	---	
c. Do continuous feed systems have a waste-feed cutoff?	---	---	---	
d. Are required daily and weekly inspections done?	---	---	---	
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)	---	---	---	
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	---	---	---	
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?	---	---	---	

*Not Inspected

Record the following information:

Tank capacity? _____ gallons

Tank diameter? _____ feet

Distance of tank from property line? _____ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				
1. Job Titles?	_____	_____	_____	_____
2. Job Descriptions?	_____	_____	_____	_____
3. Description of training?	_____	_____	_____	_____
4. Records of training?	_____	_____	_____	_____
5. Have facility personnel received required training by 5-19-81?	_____	_____	_____	_____
6. Do new personnel receive required training within six months?	_____	_____	_____	_____
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility.	_____	_____	_____	_____
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	_____	_____	_____	_____

2. If required, does this facility have the following equipment?

- a. Internal communications or alarm systems?
- b. Telephone or 2-way Radios at the scene of operations?
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Indicate the volume of water and/or foam available for fire control

3. Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
- b. Is emergency equipment maintained in operable condition?

4. Has owner/operator provided immediate access to internal alarms (if needed)?

5. Is there adequate aisle space for unobstructed movement?

C. Contingency Plan and Emergency Procedure
(Part 265, Subpart D)

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

2. Are copies of the Contingency Plan available at site and local emergency organizations?

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56?

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

(B) Has the generator submitted Annual Reports and Exception Reports as required?

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?
